

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

ABDULLAH HAYDAR,

Plaintiff,

v.

AMAZON CORPORATE, LLC,  
GARRET GAW,  
PETER FARICY, and  
JOEL MOSBY,

Defendants.

Case No. 2:16-cv-13662

Honorable Laurie J. Michelson

Magistrate Judge Stephanie Dawkins Davis

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**VERDICT FORM**

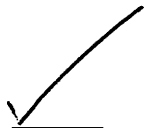
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The jury unanimously finds as follows:

1. Has Abdullah Haydar proved by a preponderance of the evidence that his religion or national origin (separately or together) was the sole reason for Amazon's decision to terminate his employment?

            
Yes

            
No



If you have answered "yes," go to question 4. If you have answered "no," go to question 2.

**2.** Has Abdullah Haydar proved by a preponderance of the evidence that his religion or national origin was a motivating factor in Amazon's decision to terminate his employment?

            
Yes

            
No



If you have answered "yes," go to question 3. If you have answered "no," go to question 8.

**3.** Has Amazon proved by a preponderance of the evidence that it would have terminated Abdullah Haydar's employment even if his religion and national origin had not played a role in its decision to terminate?

            
Yes

            
No

If you have answered "yes" go to question 8. If you have answered "no," go to question 4.

**4.** Is Abdullah Haydar entitled to economic damages for Amazon's decision to terminate his employment?

\_\_\_\_\_  
Yes

\_\_\_\_\_  
No

If you have answered "yes," answer questions 4.a., 4.b., and 4.c. If you have answered "no," go to question 5 and do not answer the remainder of question 4.

**4.a.** What amount of compensation do you award to Abdullah Haydar for past lost wages and fringe benefits through the date of your verdict as a result of his termination?

\$ \_\_\_\_\_

**4.b.** What amount of compensation do you award to Abdullah Haydar for future lost wages and fringe benefits as a result of his termination?

\$ \_\_\_\_\_

**4.c.** Do you find that Defendants proved, by a preponderance of the evidence, that Abdullah Haydar failed to mitigate his damages?

\_\_\_\_\_  
Yes

\_\_\_\_\_  
No

If you have answered "yes," answer question 4.d. and question 4.e. If you have answered "no," go to question 5.

**4.d.** By what amount did Abdullah Haydar fail to mitigate his damages?

\$ \_\_\_\_\_

**4.e.** Deduct the amount you stated in question 4.d. from the total combined amount you awarded Abdullah Haydar in question 4.a. and question 4.b. and place this amount on the line below:

Total Economic Damages \$ \_\_\_\_\_

After answering question 4.e., continue to question 5.

**5.** Is Abdullah Haydar entitled to non-economic damages for any pain, suffering, mental anguish, humiliation, sense of outrage, or indignity due to Amazon's decision to terminate his employment?

\_\_\_\_\_  
Yes

\_\_\_\_\_  
No

If you have answered "yes," go to question 5.a. If you have answered "no," go to question 6.

**5.a.** What amount of compensation do you award to Abdullah Haydar for these non-economic damages?

\$ \_\_\_\_\_

After answering question 5.a., continue to question 6.

**6.** Is Abdullah Haydar entitled to punitive damages for Amazon's decision to terminate his employment?

                            
Yes              No

If you have answered "yes," go to question 6.a. If you have answered "no," go to question 7.

**6.a.** What amount do you award to Abdullah Haydar for punitive damages?

\$                                 

After answering question 6.a., continue to question 7.

7. Did Peter Faricy discriminate against Abdullah Haydar with respect to his termination?

            
Yes

            
No

After answering question 7, continue to question 8.

**8.a.** Has Abdullah Haydar proved by a preponderance of the evidence that Amazon failed to promote him?

            
Yes

            
No



If you have answered “yes,” answer question 8.b. If you have answered “no,” do not answer any further questions on this verdict form, have the foreperson sign and date the form, and then notify the Law Clerk that you have reached a verdict.

**8.b.** Has Abdullah Haydar proved by a preponderance of the evidence that his religion or national origin was a motivating factor in Amazon’s decision not to promote him?

            
Yes

            
No

If you have answered “yes,” go to question 9. If you have answered “no,” do *not* answer *any* further questions on this verdict form, have the foreperson sign and date the form, and then notify the Law Clerk that you have reached a verdict.

**9.** Has Amazon proved by a preponderance of the evidence that it would not have promoted Abdullah Haydar even if his religion and national origin had not played a role in its promotion decision?

            
Yes

            
No

If you have answered “yes,” do *not* answer *any* further questions on this verdict form, have the foreperson sign and date the form, and then notify the Law Clerk that you have reached a verdict.

If you have answered “no,” go to question 10.

**10.** Is Abdullah Haydar entitled to economic damages for Amazon's decision not to promote him separate and apart from his economic damages for Amazon's decision to terminate him?

\_\_\_\_\_  
Yes

\_\_\_\_\_  
No

If you have answered "yes," answer questions 10.a., 10.b., and 10.c. If you have answered "no," go to question 11 and do not answer the remainder of question 10.

**10.a.** What amount of additional compensation do you award to Abdullah Haydar for past lost wages and fringe benefits as a result of Amazon's failure to promote Haydar through the date of your verdict? In determining this amount you must subtract any amount you awarded, if any, under question 4.a. Also, if you have found Abdullah Haydar's termination was not unlawful, you should not award damages beyond the date of his termination.

\$ \_\_\_\_\_

**10.b.** What amount of additional compensation do you award to Abdullah Haydar for future lost wages and fringe benefits as a result of Amazon's failure to promote Haydar? In determining this amount you must subtract any amount you awarded, if any, under question 4.b.

\$ \_\_\_\_\_

**10.c.** Do you find that Defendants proved, by a preponderance of the evidence, that Abdullah Haydar failed to mitigate his damages?

\_\_\_\_\_  
Yes

\_\_\_\_\_  
No

If you have answered "yes," answer question 10.d. and question 10.e. If you have answered "no," go to question 11.

**10.d.** By what amount did Abdullah Haydar fail to mitigate his damages?

\$ \_\_\_\_\_



**10.e.** Deduct the amount you stated in question 10.d. from the total combined amount you awarded

Abdullah Haydar in question 10.a. and question 10.b. and place this amount on the line below:

Total Economic Damages \$ \_\_\_\_\_

After answering question 10.e., continue to question 11.

**11.** Is Abdullah Haydar entitled to non-economic damages for any pain, suffering, mental anguish, humiliation, sense of outrage, or indignity due to Amazon's decision not to promote him, separate and apart from his non-economic damages for Amazon's decision to terminate him? If you have found Abdullah Haydar's termination was not unlawful, you should not award non-economic damages beyond the date of his termination.

                            
Yes              No

If you have answered "yes," go to question 11.a. If you have answered "no," go to question 12.

**11.a.** What amount of compensation do you award to Abdullah Haydar for these non-economic damages?

\$                                 

After answering question 11.a., continue to question 12.

12. Did Peter Faricy discriminate against Abdullah Haydar with respect to Amazon's failure to promote?

\_\_\_\_\_  
Yes

\_\_\_\_\_  
No

\_\_\_\_\_  
s/Foreperson

In Compliance with the Privacy Policy  
adopted by the Judicial Conference, the verdict  
form with the original signature has been filed  
under seal

11-5-19

Dated: